

UNITED STATES DISTRICT COURT  
COMMONWEALTH OF MASSACHUSETTS

LORI ANN MORAN,  
Plaintiff

V.

ANDREW DIPASQUA, MICHAEL  
SANBORN, WILLIAM F. GAY, III, and  
the ONSET FIRE DISTRICT,  
Defendants

C.A. No. 05-10033 NG

## JOINT STATEMENT

Pursuant to Local Rule 16.1(D) and this Court's Notice of Scheduling Conference, the parties hereby report to the Court as follows:

## I. AGENDA FOR SCHEDULING CONFERENCE

The parties suggest the following agenda of matters to be discussed at the conference:

- a. The proposed scheduling plan for discovery and motions;
- b. The positions of the parties regarding settlement;

## II. COMPLIANCE WITH LOCAL RULE 16.1(D)

- A. Discovery will end on January 1, 2006;
- B. Plaintiff will disclose his expert(s) by February 1, 2006;
- C. Defendant will disclose its expert(s) by March 1, 2006;
- D. All Expert Depositions shall be completed by April 1, 2006;
- E. Dispositive Motions:

Dispositive Motions shall be filed by May 1, 2006

Responses to dispositive motions will be filed by June 1, 2006

Oral Argument on the motions will take place before July 1, 2006 or such other time

as the Court deems appropriate.

F. Pretrial Conference:

The parties request a pretrial conference after a decision on the dispositive motions.

The parties suggest August 1, 2006 with trial scheduled in the weeks following.

IV. CERTIFICATIONS:

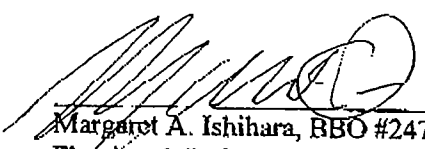
Certifications required by L.R. 16.1(D)(3) are being filed separately with the court.

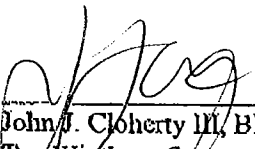
Respectfully Submitted,

The Plaintiff,  
LORI ANN MORAN  
By her attorney,

The Defendants,  
ANDREW DIPASQUA, MICHAEL SANBORN,  
WILLIAM F. GAY, III, and the  
ONSET FIRE DISTRICT,  
By their attorneys,

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I hereby certify that a true copy of the  
above document was served upon (each  
party appearing pro se and) the attorney  
of record for each (other) party by ~~mail~~ *Electronic*  
Filing (by hand) on 3.25.05